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February 3, 2023

**BY ECF**

Honorable Lewis J. Liman  
United States District Judge  
Southern District of New York  
500 Pearl Street, Room 701  
New York, New York 10007

Re: *Local 3621, et al., v. City of New York, et al.*  
No. 18 Civ. 4476 (LJL)

Dear Judge Liman:

I am the Assistant Corporation Counsel in the office of Hon. Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, assigned to represent the City of New York (“City”), the New York City Fire Department (“FDNY”), and the New York City Department of Citywide Administrative Services (“DCAS”) (collectively, “Defendants”) in the above-referenced matter. I write pursuant to the conference held with the parties on February 27, 2023, where Your Honor directed the parties to confer and either file a joint proposed case management plan or file separate proposed case management plans. The parties have conferred but have not reached an agreement. As such, Defendants write with their proposed case management plan. Defendants’ proposal for the remainder of discovery is as follows:

1. Fact discovery to be completed by **June 1, 2023**;
2. Plaintiffs shall disclose their expert report by **June 15, 2023**;
3. Defendants’ shall disclose any rebuttal expert report by **July 15, 2023**;
4. Any remaining expert discovery shall be completed by: **August 1, 2023**;

5. The Parties will submit a proposed briefing schedule for any motions for summary judgment by **August 15, 2023**;

I thank the Court for its consideration of this letter.

Respectfully submitted,

/s/

Lora Minicucci

cc: Yetta G. Kurland  
(by ECF)